

SEALED

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

Eastern District of California

**FILED**

May 16, 2024

CLERK, U.S. DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

United States of America
v.
Mohammad Amr Alhashemi,
aka Inseeno

Case No. 1:24-mj-00058-BAM

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of May 1, 2020 to February 24, 2022 in the county of Fresno in the
Eastern District of California, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
18 U.S.C. § 371;	Conspiracy to Engage in Anonymous Telecommunications Harassment, to Engage in Repeated Harassing Communication, and to Transmit Threatening Communications;
47 U.S.C. § 223(a)(1)(E);	Engaging in Repeated Harassing Communication;
47 U.S.C. § 223(a)(1)(C); and	Engaging in Anonymous Telecommunications Harassment; and
18 U.S.C. § 875(c)	Transmitting Threatening Communications.

This criminal complaint is based on these facts:

See Affidavit, attached hereto and incorporated herein by reference.

☒ Continued on the attached sheet.

Complainant's signature

Britton Wallace, Special Agent, FBI

Printed name and title

Sworn to before me and signed in my presence.

Date: 5/15/24

Judge's signature

City and state: Fresno, California

Barbara A. McAuliffe, U.S. Magistrate Judge

Printed name and title

AFFIDAVIT IN SUPPORT OF COMPLAINT

I, Britton Wallace, being duly sworn, hereby declare as follows:

I. INTRODUCTION

A. Purpose of the Affidavit

1. This Affidavit is made to support a complaint charging **Mohammad Amr Alhashemi, aka Inseeno**, with violations of 18 U.S.C. § 371 – Conspiracy to Engage in Anonymous Telecommunications Harassment, to Engage in Repeated Harassing Communication, and to Transmit Threatening Communications; 47 U.S.C. § 223(a)(1)(E) – Engaging in Repeated Harassing Communication; 47 U.S.C. § 223(a)(1)(C) – Engaging in Anonymous Harassing Communication; 18 U.S.C. § 875(c) – Transmitting Threatening Communications.

B. Agent Background

2. I am a Special Agent with the Federal Bureau of Investigation (FBI), currently assigned to the FBI's Sacramento Division, Fresno Resident Agency. I have been so employed for approximately three years. I am responsible for investigations involving primarily civil rights violations and complex financial crimes.

3. I have a Bachelor of Business Administration in Accounting degree and a Master of Financial Management degree from Texas A&M University. I have gained experience through previous civil rights investigations and through training, classes, and conferences. I have utilized subpoenas and Section 2703(d) court orders to identify users of online accounts through subscriber records, internet protocol (IP) addresses and other data. I have assisted and/or planned in the execution of warrants to search particular places, premises and persons that included electronic devices and data. I have written reports and analyzed records and documents in conjunction with the preparation of affidavits requesting authorization for the execution of search and arrest warrants and I have authored, planned, and executed said warrants.

1 4. I am an “investigative or law enforcement officer” within the meaning of Section 2510(7)
2 of Title 18 of the United States Code, that is, an officer of the United States who is empowered by law to
3 conduct investigations of, and to make arrests for, offenses enumerated in Section 2516 of Title 18 and
4 Title 21 of the United States Code.

5 5. Unless stated otherwise, I have personal knowledge of all of the matters set forth in this
6 Affidavit. To the extent any information in this Affidavit is not within my personal knowledge, it was
7 made known to me through my own review of the documents discussed in this Affidavit and through
8 reliable law enforcement sources, including discussions with other law enforcement officers and
9 intelligence analysts assigned to this case. The conclusions and opinions set forth below are based on
10 my experience and training as an FBI Special Agent, and conversations I have had with other law
11 enforcement officers and an FBI computer scientist who are familiar with the facts and circumstances of
12 this investigation.
13

14 6. The FBI Computer Scientist with whom I conferred has been so employed since June
15 2020. In his capacity as an FBI Computer Scientist, his duties include performing forensic computer
16 analysis, malware analysis, data analysis, and network traffic analysis. The FBI Computer Scientist with
17 whom I conferred earned a Bachelor of Science degree in computer science from the University of
18 Kentucky. He has participated in FBI Computer Scientist Field Operations Training, including
19 Mandiant Linux Enterprise Incident Response (5 days), Mandiant Network Traffic Analysis (5 days),
20 Mandiant Router Backdoor Analysis (2 days), Computer Analysis and Response Team (CART) Tech
21 Training (5 days), and Mandiant Malware Analysis Master Course (5 days). He is a certified CART
22 Tech and GIAC Certified Forensic Examiner (GCFE). GIAC is an active accredited ISO/IEC 17024
23 Personnel Certification Body through the American National Standards Institute (ANSI) National
24 Accreditation Board (ANAB).
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7. Because I am submitting this Affidavit for the limited purpose of securing a complaint and arrest warrant for the individual identified above, I have not included every fact known to me about this investigation. I have only included those facts that I believe are necessary to establish probable cause for the criminal complaint and arrest warrant requested herein.

II. APPLICABLE LAW

8. Title 18, United States Code, Section 371 (Conspiracy), provides:

If two or more persons conspire . . . to commit any offense against the United States . . . and one or more of such persons do any act to effect the object of the conspiracy, each shall be fined under this title or imprisoned not more than five years, or both.

9. Title 47, United States Code, Section 223(a)(1)(C) (Engaging in Anonymous Telecommunications Harassment), provides:

(a) . . .Whoever—

(1) in interstate or foreign communications— . . .

(C) . . . utilizes a telecommunications device, whether or not conversation or communication ensues, without disclosing his identity and with intent to abuse, threaten, or harass any specific person; . . .

shall be fined under title 18 or imprisoned not more than two years, or both.

10. Title 47, United States Code, Section 223(a)(1)(E) (Engaging in Repeated Harassing), provides:

(a) . . .Whoever—

(1) in interstate or foreign communications— . . .

(E) makes repeated telephone calls or repeatedly initiates communication with a telecommunications device, during which conversation or communication ensues, solely to harass any specific person; . . .

shall be fined under title 18 or imprisoned not more than two years, or both.

11. Title 18, United States Code, Section 875(c) (Transmitting Threatening Communications), provides:

(c) Whoever transmits in interstate or foreign commerce any communication containing any threat to kidnap any person or any threat to injure the person of another, shall be fined under this title or imprisoned not more than five years, or both.

III. STATEMENT OF PROBABLE CAUSE

A. Summary of Investigation

12. **Mohammad Amr Alhashemi** (hereinafter referred to as “**Alhashemi**”) is a Syrian national with a home address in Tirana, Albania and a student at Teesside University in Middlesbrough, England, who is studying software engineering. Prior to his entry into the United Kingdom, he orchestrated Zoom bombs or Zoom raids of public or open Zoom meetings during the COVID-19 pandemic for the purpose of disrupting the meetings with threatening racist, antisemitic, and homophobic remarks.¹ This complaint focuses on four different Zoom bomb incidents committed by **Alhashemi** in 2020. Three of the Zoom bomb incidents occurred during multiple separate Fresno City Council, California Zoom meetings open to the public during June 2020. The fourth occurred during a virtual Jewish religious service in Albuquerque, New Mexico. **Alhashemi** used a multitude of monikers and screen names that facilitated anonymity. However, the digital footprint left behind tied the incidents together as being perpetrated by the use of a common device, and also identified several key pieces of evidence identifying **Alhashemi** as the perpetrator using the device. As set forth more fully below, commonalities among IP addresses, e-mail accounts, social media accounts, a phone number, MAC addresses, and unique Zoom ID’s identify **Alhashemi’s** device as being used to infiltrate Zoom meetings and insert divisive threatening language and images into public meetings. The movement of **Alhashemi** across countries (Albania, Saudi Arabia, and England) in tandem with IP data linked to accounts listed above, along with **Alhashemi’s** continued racially divisive and threatening communications identifies **Alhashemi** as being the user of his various accounts and device and

¹ “Zoom bombing” is a term referencing when strangers enter into planned Zoom meetings and participate in disruptive and sometimes inappropriate behavior.

committing the offenses alleged – Conspiracy in violation of Title 18, United States Code, Section 371; Engaging in Anonymous Telecommunications Harassment in violation of Title 47, United States Code, Section 223(a)(1)(C); Engaging in Repeated Harassing in violation of Title 47, United States Code, Section 223(a)(1)(E); and Transmitting Threatening Communications in violation of Title 18, United States Code, Section 875(c). During these intrusions, the Zoom raid group members would disrupt Zoom meetings and make threats motivated by hate towards a variety of protected classes, including African Americans, Jews, and members of the LGBTQ community. The Zoom raid group members utilized a variety of secure messaging applications, including Guilded and Discord, to organize and identify open Zoom meetings in the United States.

B. Zoom Bomb Incidents

13. The FBI began investigating the Zoom bomb incidents in June 2020 after several Fresno City Council Zoom meetings were interrupted by individuals who were making racially charged threats. By obtaining Zoom records related to the accounts used to make the threats, a pattern began to develop identifying numerous commonalities among the account and identifiers linked to one of the accounts ultimately identifying **Alhashemi** as the person using the account and making the threats.² The IP addresses of the individual who made the threats were very similar and indicated the same internet service provider was utilized. Zoom records also led to the discovery of **Alhashemi**'s presence during the antisemitic Zoom bombing of a New Mexico Jewish service, which was sandwiched between the Fresno City Council Zoom bombs.

a. June 9, 2020, Fresno City Council Meeting

14. On June 9, 2020, the Fresno City Council held a Zoom hearing on the budget.³ The recorded Zoom meeting revealed the faces of the Councilmembers. Zoom records indicate that “Jacob

² The Zoom moderator would unmute individual speakers who wanted to make a public comment, making identification of the caller possible.

³ Any and all references herein to dates and times are to approximate dates and times.

Rothschild” (later identified as **Alhashemi**) was present. Other co-conspirators were also present. Someone, who has not yet been identified, Zoom bombed and was excluded from the meeting. The Council President immediately called for shutting the meeting down and asked for another Zoom link with more appropriate controls. However, the President’s request was declined due to the fact that reopening the meeting with a new Zoom link would not constitute sufficient public notice.

15. Zoom records indicate that screen name “Jacob Rothschild” (later identified as **Alhashemi**) logged into the Fresno City Council Zoom call from IP address: **79.106.126.173** beginning on June 9, 2020, at 16:08:19 UTC and logged off from the same IP address on June 9, 2020, at 16:09:04 UTC. IP address **79.106.126.173** was **leased out by an Albanian internet service provider (ISP), ALBtelecom**. Zoom records also indicate that “Jacob Rothschild” had a Media Access Control (MAC) address of **185E0FE141C8** and a Zoom Universally Unique Identifier (UUID) of **742Va33YoA0zbdaSxZmHpHb5X4SAo7e5bjm8K9g/IP0=**. This evidence becomes more clearly significant as additional Zoom bombings occurred and the same MAC address and UUID, and IP addresses leased out by the same Albanian ISP, ALBtelecom were used to perpetrate the Zoom bombings. These are detailed further below.

16. Based on records obtained from Zoom, “Juliet Capulet,” was also present during this meeting and was logged into IP address 96.36.64.91. An online query of IP address “96.36.64.91” revealed it was owned by Charter Communications and resolved to Spartanburg, South Carolina. The FBI later obtained a federal search warrant for a Spartanburg, South Carolina address where R.B., a juvenile with a history of making threats, resided with his parents and seized relevant digital evidence, as indicated below, during the execution of the warrant on August 27, 2020. The Zoom UUID associated with “Juliet Capulet” also appeared in later Zoom bombs, as described below.⁴

⁴ The UUID is a hashed unique identifier established by Zoom based on the user’s unique computer configuration which follows the user from one meeting to another despite the IP address used. The UUID is a hashed number based on the Zoom user’s computer configuration and other variables.

b. **June 11, 2020, Fresno City Council Meeting**

17. On June 11, 2020, the Fresno City Council held another public city council meeting via Zoom. According to the Council President, there were approximately 200 participants present during the meeting.

18. On this day, the Fresno City Council was hosting a workshop presented by the California State University Fresno chapter of the National Association for the Advancement of Colored People (NAACP) on the topic, “Building Community Trust and Accountability While Protecting Social Justice.” African American members of the community were in attendance, made the NAACP presentation, and were represented on the City Council and staff. Immediately following the presentation, the Fresno City Council allotted time for public comments. The moderator for the Zoom call unmuted one participant at a time for the public comment portion of the meeting. The moderator would identify the next speaker by their Zoom screen name and unmute them. This occurred for each of the subsequent Fresno City Council meetings as well.

19. During this public comment time, an individual using the Zoom screen name “Bryan Patterson,” who was later identified as **Alhashemi**, was unmuted and stated the following:

Uh hello, my name is Bryan, uh I'm a local resident in Frenso [sic] city, and I just wanna . . . I, I agree totally with the previous um speaker and I just want to say that, that we, we should defund the police, and I'll tell you why . . . the main reason is because, uh, there are still niggers in this city, we should kill all niggers, I'm telling you right now, kill all the niggers or . . .

20. As Councilmembers shook their heads in disgust, “Bryan” was excluded from the meeting.

21. Immediately after “Bryan Patterson” spoke, an individual who used the Zoom screen name “Arthur Callahan Morgan,”⁵ (later identified as R.B.) could be heard laughing. According to President Arias, “Arthur” said “nigger” before being removed from the call. Arias stated that the public

⁵ Arthur Morgan is a central character and the primary protagonist of Red Dead Redemption, a violent video game.

1 may not have heard it as a result of the delay between what the moderators heard and what was
2 broadcast to the public.

3 22. Soon after the incident, the FBI interviewed an African American City Councilmember,
4 who stated that upon hearing those statements, he initially felt angry, sick, offended, shocked, and
5 embarrassed and hurt for the community. However, after the meeting, he felt threatened by the
6 statements and became concerned for his life and that of his family.

8 23. The FBI also interviewed an African American pastor who was present during the June 11
9 Zoom meeting. The pastor prayed during the NAACP presentation prior to the time for public
10 comments. He indicated that he initially believed the threats were meant to be a joke, but he took it
11 seriously and it concerned him. Upon hearing the statements, the pastor felt shock, anger, and
12 thankfulness that others who thought racism was dead could now see that it was real. Later, however,
13 the pastor recalled feeling fear and intimidation and sensed the need to be cautious and get protection for
14 his family and church. The pastor stated, "It was a threat" and "black folks were not shocked" (referring
15 to not being surprised by racism). The pastor further indicated that he thought the caller meant to insight
16 fear directly towards the previous NAACP presenters.

18 24. The Fresno State University Chapter NAACP President advised the FBI that at one point
19 during the meeting, she was shocked to hear one Zoom participant say something to the effect ". . . and
20 that is why we should kill all niggers." The NAACP President advised that the statement by the Zoom
21 user made her feel angry and later fearful.

23 25. The NAACP President related that she heard from other individuals on the Zoom call that
24 one Zoom user put up a picture of the genitalia of an African American male and another user put up a
25 picture of an African American man being hung. She also indicated that on June 12, 2020, she received
26 a phone call where the caller identification displayed, "FBI Seattle Division." The phone call originated
27 from a Seattle, Washington phone number and the voicemail left by the individual referred to George
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1 Floyd's criminal history. The caller suggested that the NAACP should discuss George Floyd's criminal
2 history and that people have the right to know. The NAACP President stated that her phone number had
3 been listed as the Instagram contact for the Fresno State NAACP until June 11, 2020, and opined that
4 the caller may have retrieved her number from the Instagram account. This incident made the NAACP
5 President feel that they had to be more careful now.
6

7 26. The FBI also interviewed the President and CEO of an organization that advocates for
8 Fresno's Black community, who was also present during the June 11 Zoom meeting and was a presenter
9 for the NAACP workshop. During the meeting, this community advocate observed a Zoom user with a
10 screen showing a pornographic meme that flashed up on the screen about two times. Immediately
11 following the NAACP Workshop and this advocate's presentation, the Fresno City Council allowed for
12 public statements. During this portion of the meeting, the advocate noticed two Zoom screen names that
13 were racially derogatory and threatening. She took a screen capture during the meeting and provided
14 them to the interviewing FBI agent. One screen name read "FUCK NIGGERS" and the other read "TO
15 KILL THEM LI . . ." The community advocate indicated that the threats occurred around the time that
16 African American speakers were presenting and, although a Caucasian speaker was presenting on
17 similar topics later on in the call, there were no similar interruptions or derogatory communications.
18

19 27. During the time for public comments, the community advocate advised that two Zoom
20 users made threatening verbal comments that urged the killing of African Americans. She also recalled
21 the caller referred to African Americans as "niggers." Upon hearing the threats, the community
22 advocate advised that her "heart sank" and she felt scared, fearful and apprehensive. The comments felt
23 personal and made her feel targeted. She also felt threatened for her life and that of her children. After
24 the meeting, the community advocate had trouble sleeping, did not feel safe in her own home, and
25 wondered whether someone might show up at her residence to harm her and her family.
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1 28. On June 12, 2020, the day after the city council Zoom bombing, the community advocate
2 received a phone call during which an unknown caller said, “Nigger” in a muffled voice and hung up.

3 29. Zoom records indicate that screen names “Bryan Patterson” and “Matte Flores” (later
4 identified as **Alhashemi**) logged into the Fresno City Council Zoom call from IP address:
5 **79.106.126.248** beginning on June 11, 2020, at 18:53:14 UTC and 19:06:39 UTC, respectively, logged
6 off from the same IP address June 11, 2020, at 19:04:24 UTC and 19:17:29 UTC, respectively. IP
7 address **79.106.126.248** was **leased out by an Albanian internet service provider (ISP), ALBtelecom**
8 – the same ISP as in the previous Zoom bomb incident and the same ISP as used in the incidents detailed
9 below. Zoom records also indicate that “Bryan Patterson” and “Matte Flores” had a MAC address of
10 **185E0FE141C8** and a Zoom UUID of **742Va33YoA0zbdaSxZmHpHb5X4SAo7e5bjm8K9g/IP0= --**
11 both the same as in the previous Zoom bomb incident and also used in the incidents detailed below
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13 30. Based on records from Zoom, “Arthur Callahan Morgan” (later identified as R.B.) was
14 also logged into this meeting utilizing IP address 96.36.64.91, an IP address associated with R.B. The
15 Zoom UUID associated with R.B. in the June 9 meeting was also listed for “Arthur Callahan Morgan.”
16

17 31. Based on records from Zoom, C.G., who was then a juvenile and resident of North
18 Caldwell, New Jersey, was also present at the June 11 meeting under screen names “Troy Dan” and
19 “Walker Lucas.” Both “Troy Dan” and “Walker Lucas” used a VPN that obfuscated the location of his
20 IP address. Ultimately, the FBI determined C.G.’s physical address in North Caldwell, New Jersey and
21 obtained a federal search warrant for it. As a result of the execution of the warrant, the FBI obtained
22 relevant information from C.G. that established that he was part of the same Zoom raid group as “Bryan
23 Patterson,” as discussed below.
24

25 c. **June 15, 2020, Fresno City Council Meeting**
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27 32. On June 15, 2020, the Fresno City Council held a public city council meeting via Zoom on
28 the budget for the airport. The recorded Zoom meeting reveals that, during the first section for public

1 comments, an individual, using Zoom screen name “Johnathan O’Bryan” (later identified as **Alhashemi**)
2 was unmuted and stated the following:

3
4 *Um yes, hello, uh my name is Johnathan O’Bryan and I live in Fresno*
5 *[sic] City District One and I just want to mention that the airports are*
6 *getting filled with niggers, so many fucking niggers, please kill them all,*
7 *seriously, no more niggers in airports alright? Make this a thing and . . .*

8 33. The Zoom moderator quickly excluded “O’Bryan” from the meeting, while others in
9 attendance, shook their heads in disbelief and said, “Oh my God.”

10 34. Hours later, during the same meeting and another section for public comments, an
11 individual, using screen name “Johnathan Mcallster” (later identified as **Alhashemi**) was unmuted and
12 stated:

13 *Uh hello my name is Johnathan, uh, I live in Fresno [sic]. I’m a local*
14 *resident in Fresno [sic], California, and uh . . . I just want to say that we*
15 *should defund the police and kill all niggers and faggots thank you . .*

16 35. The Zoom moderator immediately excluded “McAllster” from the meeting, while others
17 in attendance gasped, looked disgusted, shook their heads in disbelief, and said, “Here we go.”.

18 36. During the meeting, a person logged on and off using screen names Brian Mcallster, Felix
19 Kjellberg, Mike Patterson, and Michael Patterson (all later identified as **Alhashemi**) and did not disclose
20 his true identity.

21 37. The African American Councilman subsequently advised the FBI that during the public
22 comment portion of this meeting, an individual came on the call and stated something to the effect of,
23 “Get all the niggers out of the airport.” He also said that others told him that the individual who spoke
24 these words sounded like the same individual who spoke under Zoom screen name “Bryan Patterson”
25 during the June 11, 2020, Zoom meeting.

26 38. An African American who is Fresno City’s Director of Transportation, who was present
27 during the Zoom meetings on June 11, June 15, and, subsequently, June 25, told the FBI that he heard all
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1 of the derogatory statements made during these meetings. Regarding the June 11 meeting, the Director
 2 indicated that he initially thought the individuals making the racist statements were just “knucklehead”
 3 kids speaking foolishly. However, it troubled him that the statements were made when the
 4 NAACP/Black Lives Matter of West Fresno presentation occurred. Nevertheless, the Director figured
 5 that the individuals making the statements during the June 11 meeting were ignorant young people just
 6 “popping off.”

8 39. The Director’s feelings changed after the June 15 and June 25 Fresno City Council Zoom
 9 calls. He told the FBI that on June 15 an individual came on the call and stated something to the effect
 10 of, “Kill all the fucking niggers.” At the time, the Director was in a conference room with the Fresno
 11 City Manager in order to address the council with his budget presentation. The disparaging comment
 12 was made after the Director had completed his budget presentation to the council prompting the city
 13 manager to ask if he was ok, since the statement was directed towards African Americans. The Director
 14 indicated that he did not readily dismiss these comments, as he had previously. Rather, in the context of
 15 the June 11 threats, the Director felt frustrated and exasperated that these types of statements were made
 16 yet again.

18 40. Zoom records indicate that “Johnathan O’Bryan” and “Johnathan Mcallster) (later
 19 identified as **Alhashemi**) logged into the Fresno City Council Zoom call from IP address:
 20 **79.106.126.179** beginning on June 15, 2020, at 16:10:52 UTC and 18:03:21 UTC, respectively, and
 21 logged off from the same IP address June 15, 2020, at 16:13:10 UTC and 18:13:42 UTC, respectively.
 22 IP address **79.106.126.179** was also **leased out by ALBtelecom, the Albanian internet service**
 23 **provider.** Brian Mcallster, Felix Kjellberg, Mike Patterson, and Michael Patterson also logged into the
 24 Fresno City Council Zoom call from IP address: **79.106.126.179**. Zoom records also indicate that
 25 “Johnathan O’Bryan”, “Johnathan Mcallster”, “Brian Mcallster”, “Felix Kjellberg”, “Mike Patterson”,
 26
 27
 28

and “Michael Patterson” all had a MAC address of **185E0FE141C8** and a Zoom UUID of **742Va33YoA0zbdaSxZmHpHb5X4SAo7e5bjm8K9g/IP0=**.

41. Zoom records also indicate that C.G. was again present during the June 15 Fresno City Council meeting under the screen name “Daniel Colins.” “Daniel Colins” entered the Zoom call through IP address 24.191.116.145. An online query of IP address 24.191.116.145 revealed it is leased out by Optimum, and resolved to the state of New Jersey. Records from Optimum attributed IP address 24.191.116.145 to a subscriber residing at an address in North Caldwell, New Jersey.

42. Zoom records further indicate that R.B. was again present during the June 15 Fresno City Council meeting, using the screen name “Calvin Lee Vail” and the same IP address as before. The UUID associated with “Calvin Lee Vail” is also associated with “Juliet Capulet” during the June 9 meeting and “Arthur Callahan Morgan” during the June 11 meeting and, as discussed below, “Arthur Mogan,” “John Marston,” and Juliet Rossi,” during the June 22 meeting and “Arthur Morgan” and “John Marston” during the June 25 meeting.

43. Following the search of R.B.’s residence on August 27, 2020, agents seized R.B.’s computer and found messages on R.B.’s Discord account regarding the June 15 Fresno City Council meeting, correctly referencing the Zoom meeting number, and urging co-conspirators to join the meeting:

546 are u guys gonna do the council meeting?
547 <https://zoom.us/j/98578032932> Fresno City Council will be discussing the police budge at 1:30 PM on zoom. Join in top participate or hear and support the defunding
548 ITS RIGHT NOW

d. June 20, 2020, Albuquerque Jewish Service

44. On June 20, 2020, the Zoom raid group responsible for the foregoing Fresno City Council Zoom bombings also Zoom bombed a virtual Jewish service in Albuquerque, New Mexico. The Zoom recording shows a female lay member of the congregation speaking and reading. During the reading,

1 there is what appears to be a coordinated Zoom raid involving many different people, who hurled the
2 following insults:

3 *Holocaust never happened, Bitch* .

4 *Shut up big-nosed, Jews.*

5 *Jews don't matter.*

6 *Gas the Jews. Gas the Jews. Gas the Jews.*

7 *You stupid nasty Jews. Kill all of you.*

8
9 45. While making these verbal comments, the Zoom raiders flashed images of swastikas on
10 the screen. As a result, the leader of the prayer service was visibly shaken and started tearing up. She
11 then instructed everyone to "please leave the meeting." As the congregants left the meeting, the Zoom
12 raiders continued to make verbally threatening statements. The video ended with the final statement:

13 *Kill all of you.*

14
15 46. The synagogue's volunteer IT coordinator downloaded the original video of the Zoom
16 call but did not save the chats. The IT coordinator stated that "definitely more than one person" was
17 involved in the disruption of the virtual religious service. He indicated that he excluded disruptive users
18 from the call but they kept coming. Consequently, he terminated the Zoom religious service. He
19 indicated that following this incident the congregation implemented additional security measures.

20
21 47. A volunteer security coordinator for the synagogue contacted the FBI and the
22 Albuquerque Police Department (APD) to report the disruption of the service, which he attended.
23 According to the security coordinator, on the morning of June 20, 2020, the synagogue held a virtual
24 worship service using Zoom. Approximately 30 to 50 minutes into the religious service, the Zoom
25 meeting was "flooded" with audio, text chats, images, and video clips featuring antisemitic and Nazi
26 imagery and content. The service was suspended and many attendees were too upset to rejoin.
27 Approximately 30 minutes into the service, the security coordinator noted that there was a "real good
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crowd," including approximately two pages of users. The user list jumped suddenly to three pages and the security coordinator felt like something bad was going to happen. Approximately 50 minutes into the service, chats, videos, and images of antisemitic and Nazi imagery "flooded the call" and the moderator terminated the Zoom meeting.

48. According to the security coordinator, the congregation regularly posted a schedule of Zoom events. Because elderly congregants had had difficulty logging into Zoom, events were sometimes streamed to Facebook to make access easier. Someone had posted the Zoom call instructions on Facebook and the Zoom call was not password protected. At prior smaller Zoom events, moderators asked attendees to introduce themselves. Some of the attendees were unknown to the moderators and declined to introduce themselves. The security coordinator indicated to the FBI that he believed the disruption was coordinated and involved more than one user.

49. According to the security coordinator, some of the attendees were children of Holocaust survivors. Many attendees were "traumatized" by the disruption and the Nazi imagery used. Some attendees were afraid to rejoin virtual religious services. The synagogue had been the victim of a few ransomware attacks and incidents of vandalism in the past.

50. Zoom records show that screen name "Johnathan B." (later identified as **Alhashemi**) was present during the Jewish service. But, unlike the Fresno City Council meetings, it is impossible to digitally attribute any of the specific threats directly to anyone, including **Alhashemi**. This is because the Fresno City Council meetings unmuted one person at a time for public input, whereas in the New Mexico Jewish worship service, members of the Zoom raiders spoke and played audio at the same time. Zoom records indicate that "Johnathan B" had a MAC address of **185E0FE141C8** and a Zoom UUID of **742Va33YoA0zbdaSxZmHpHb5X4SAo7e5bjm8K9g/IP0=**.

51. B.O., a juvenile from Mint Hill, North Carolina, later admitted that he was present during the Jewish religious service, confirmed he was part of a Zoom raid group headed by Inseeno (later

identified as **Alhashemi**), and identified the voices of some of its members, including “Sapper” and “Anti,” later identified as M.M. Zoom records indicate that B.O. used the screen name “Emily C.” Zoom records also indicate that B.O. was present during the June 9 Fresno City Council meeting using the screen name “Nick B,” June 11 council meeting using the screen name “Ashley M,” June 15 council meeting using the screen names “Ashley May” and “Jack J,” June 22 council meeting using the screen names “Emily C” and “Nick B,” and “Jack.” The same Zoom UUID is listed despite all of the screen name changes.

52. Zoom records also show that R.B., using the screen name “Juliet Rossi,” was also present for the Jewish religious service, as indicated by the UUID associated with R.B. in the Fresno City Council meetings. Zoom records confirm that M.M., using the screen name “Benjamin F.,” was also present.

e. June 22, 2020, Fresno City Council Meeting

53. On June 22, 2020, the Fresno City Council held another public city council meeting on the budget via Zoom. The recorded Zoom meeting indicates that, during the meeting, one of the City Councilmembers discussed the disproportionate impact of COVID-19 on minority communities with a focus on the African American community in southwest Fresno and moved to allocate CARES Act money for improvements in southwest Fresno.

54. According to the Zoom moderator, an hour before the actual start time of the meeting. Several callers came online and were virtually “raising their hands” to speak. Upon being called on by the moderator, several callers made disparaging remarks against the African American community. At least one caller suggested “killing niggers.” The moderator recalled that the voices of the callers were similar to callers who had spoken during Zoom meetings in the weeks prior. This “pre-meeting” discussion was not recorded.

1 55. Although the disparaging comments were not captured, the unedited recorded video does
2 show that the moderator made a written announcement in the chat function to all users with the
3 following warning:

4 Due to the recent racist comments, we are working with the FBI and Zoom
5 to identify and track down those parties who have made the comments.
6 We ask that you be courteous and respectful to others. The FBI and Zoom
are currently monitoring this meeting, and all connections made to it to
track down and file charges against anyone making threatening comments.

7 56. However, despite the warning, users continued to target the next Fresno City Council
8 Zoom call held on June 25, 2020. Although there are no recorded statements of **Alhashemi** for the
9 June 22 Fresno City Council meeting, Zoom records reveal the presence of the same individual (later
10 identified as **Alhashemi**), using the screen names “Lynn Portmen,” “Michael Portmen,” and “Ryan
11 Patterson,” and “Inseeno O’Mally,” through the **same MAC** address, the same block of IP addresses
12 **79.106.126.188** from the Albanian ISP **ALBtelecom** and the **same Zoom UUID**. The use of the screen
13 name “**Inseeno O’Mally**” is the first known appearance of the moniker “**Inseeno**.” Subsequent
14 investigation revealed that **Alhashemi** typically used the moniker “**Inseeno**” during communications
15 with his co-conspirators.
16

17 57. Zoom records also indicate that R.B., using the screen names “Arthur Mogan,” “John
18 Marston,” and “Juliet Rossi,” was present again during the June 22 Fresno City Council meeting, with
19 the same Zoom UUID as the June 15 meeting.
20

21 58. Zoom records also revealed that M.M. was present during the June 22 Fresno City
22 Council meeting, using the screen name “Henry W.” with the same Zoom UUID used during the New
23 Mexico Jewish service. M.M. often used a virtual private network when conducting these Zoom raids,
24 so the IP addresses captured by Zoom were mostly irrelevant. M.M. later told United Kingdom law
25 enforcement that he was part of **Inseeno**’s Zoom raid group. Inseeno was later linked to **Alhashemi**.
26
27
28

59. Zoom records also indicate that C.G. was present on the June 22 Fresno City Council meeting under screen names “George A Seus,” “Christian Wood,” and “Adam Lanza.”⁶ Zoom records for this meeting indicate that “George A Seus,” “Christian Wood” and “Adam Lanza” all logged into this Zoom meeting with IP address 24.191.116.145 and all shared the same Zoom UUID.

f. **June 25, 2020, Fresno City Council Meeting**

60. On June 25, 2020, the Fresno City Council held a public city council meeting via Zoom. A recording of the meeting revealed that, before public comments were allowed, a Councilmember and Council President applauded the resignation of a local school district trustee after posting a racist message on social media. The Council member indicated that there was a need for a discussion about insensitive comments and educating the public about the history of racism. Shortly thereafter, the City Council permitted public comment and the moderator admitted callers one by one. The first admitted caller (“Tony Gonk”) was also present during the June 15 meeting. After making an inappropriate comment, he was excluded. The next caller also made an inappropriate comment and was excluded. R.B., using the screen name “Arthur Morgan,” was admitted next and was excluded after making an inappropriate comment. “Lilia” was then admitted and was also excluded after making an inappropriate comment. “Caroline Evan” was next admitted and was excluded after an inappropriate comment.

61. Next, “Michael Patterson,” (later identified as **Alhashemi**) was unmuted and stated:

My name is Michael Patterson and I just want to say kill all niggers.

62. “Michael Patterson” was immediately excluded from the meeting. At that point, the Council President stated he was ending public comment and noted that “the FBI is observing our meeting today and will be following up with anybody that makes threats to the Council or the public in this forum.”

⁶ Adam Lanza is the name of the Sandy Hook School shooter.

63. Hours later, during the same meeting and during another section for public comments, Zoom screen name “Chris K-Andesron [sic]” (later identified as **Alhashemi**) was unmuted and stated:

Uh I just wanted to say kill all niggers and faggots, thank you.

64. “Chris” was immediately excluded from the meeting, as council members shook their heads in disgust.

65. Fresno’s Director of Transportation attended the June 25 Fresno City Council Zoom meeting. The Director indicated to the FBI that following the June 11 and June 15 threats he felt “fed up” as he heard two statements made about killing African Americans and another about killing African Americans and homosexuals. The Director indicated that the second statement, regarding killing both African Americans and members of the LGBTQ community, were especially troubling, since he is the proud father of a daughter, who is a lesbian. This incident made the Director feel targeted, both because of his daughter and the fact that he is the only African American director employed under the Fresno City Mayor and the Fresno City Manager.

66. Zoom records indicate that “Michael Patterson” and “Chris K-Andesron” logged into the Fresno City Council Zoom call from IP address: **79.106.126.124** beginning on June 25, 2020, at 16:38:02 UTC and 21:45:11 UTC, respectively and logged off from the same IP address June 25, 2020, at 16:51:22 UTC and 21:45:17 UTC, respectively. IP address **79.106.126.124** was also leased out by **ALBtelecom**.⁷ Zoom records also show that screen names “Megan P,” “Megan Charolett” and “Michael Washburn” (later identified as **Alhashemi**) were used during the June 25 meeting. The IP addresses for these individuals were the same and were from the same block of IP addresses associated with “Michael Patterson” and “Chris K-Andesron,” as well as “Jacob Rothschild” in the June 9 Fresno City Council meeting, “Bryan Patterson” and “Matte Flores” in the June 11 meeting, and “Johnathan

⁷ This particular budget meeting went for hours and, according to President Arias’s comments during the recorded proceeding, may have extended through the dinner hour.

B” in the New Mexico Jewish service. Zoom records also indicate that “Michael Patterson,” “Chris K-Andesron,” “Megan P,” “Megan Charolett,” and “Michael Washburn” all had a MAC address of **185E0FE141C8** and a Zoom UUID of **742Va33YoA0zbdaSxZmHpHb5X4SAo7e5bjm8K9g/IP0=**.

67. In sum, for all of the Fresno City Council meetings and the New Mexico worship service, the following Zoom screen names described above were in attendance: Jacob Rothschild, Matte Flores, Bryan Patterson, Johnathan O’Bryan, Brian Mcallster, Jonathan Mcallster, Felix Kjellberg, Mike Patterson, Michael Patterson, Johnathan B., Lynn Portmen, Michael Portmen, Ryan Patterson, Inseeno O’Mally, Megan Charolett, Megan P., Michael Washburn, and Chris K-Andesron. A review of Zoom records for all of these Zoom screen names shows that all these accounts shared the same below identifiers:

Zoom UUID: 742Va33YoA0zbdaSxZmHpHb5X4SAo7e5bjm8K9g/IP0=

MAC Address: 185E0FE141C8

IP Address starting with 79.106.126

68. These common identifiers that are associated with the aforementioned Zoom screen names indicate that the same digital device was used based on the common MAC address, which identifies the digital device used. Records obtained from Intel indicate that the device as an Intel digital device. Further, the Zoom UUID indicates that Zoom identified each individual as using the same device based off Zoom’s identification of the device configuration. Finally, the sharing of the IP address is significant, because that block of IP addresses resolved to Tirana, Albania, and **Inseeno** (later identified as **Alhashemi**) was identified as the only member of the Zoom bomb group to have ties to Albania.

69. Zoom records indicate that C.G. was also present during the June 25 Fresno City Council meeting using the screen name “Vance Walker.” Zoom records further indicate that “Vance Walker” logged into this Zoom meeting with IP address 24.191.116.145.

70. Zoom records also show that R.B. was present during this meeting and used the screen names “Arthur Morgan” and “John Marston.” The Zoom UUID was the same as what R.B. used for the June 22 Fresno City Council meeting.

71. Zoom records further reveal that an individual using the screen name “Federal Bureau Of Investigation” was present during the June 15 Fresno City Council Zoom meeting. The individual, later identified as D.K., believed to a Turkish national who uses the moniker “Cannabalist,” appeared to provide Zoom with his actual email address. D.K. was removed from the meeting for impersonating a law enforcement officer. As explained below, racist and antisemitic material located on YouTube led to the discovery that **Inseeno** (later identified as **Alhashemi**), C.G., R.B., M.M, B.O., D.K., and others were part of the same Zoom raiding group, which specifically targeted Zoom meetings in order to disrupt public meetings, religious services, school meetings, and other events. using hate speech and threatening communications. The Zoom raid group members used chat applications, such as Discord, to virtually gather together as a group to coordinate and conspire together to conduct their Zoom raids.

C. Email Association with Alhashemi

72. Although Zoom users are often not required to provide true email addresses to log into a public Zoom call, Zoom records were obtained for the Zoom UUID attributed to **Alhashemi**. These records showed that **Alhashemi** provided true email addresses on several occasions in May 2020, including amrtamar23@gmail.com and amrtamar29@gmail.com. Zoom records show that **Alhashemi** used the following Zoom screen names in May 2020: “Bryan Lozano,” “Gregory M,” “John Abadi,” “Faustino Benitez David,” “Susan Mills,” “Kate Jenner,” “Ahmed Sharif,” “Shamilah Sharif,” “Brad B,” and “Charlie C.” The user of the aforementioned Zoom screen names had been present during Zoom meetings as early as May 2020, the start date of the conspiracy, based on the shared Zoom UUID information acquired from Zoom .

73. Google records indicate that three email accounts– amrtamar23@gmail.com, amrhashemi404@gmail.com, and amrtamar29@gmail.com – used IP addresses consistent with the Zoom incidents described above and had multiple common login/logout IP addresses. . For example, IP address **79.106.126.188** was utilized to access amrhashemi404@gmail.com on June 21, 2022 at 17:53:56 UTC, amrtamar29@gmail.com on June 21, 2022 at 17:50:21 UTC, and amrtamar23@gmail.com on June 21, 2022 at 17:52:04 UTC. This was the same IP address utilized by “Lynn Portmen,” “Michael Portmen,” and “Ryan Patterson,” and “Inseeno O’Mally” in the June 22, 2020 Fresno City Council meeting, as well as “Johnathan B” in the June 20, 2022 Jewish religious service. Based on my training and experience and my consultation with the FBI Computer Scientist whose expertise is described above, separate online accounts utilizing the same IP address within a short period of time strongly suggests that that the accounts were accessed by a single customer or subscriber . While a customer or subscriber’s IP address can shift naturally over time, as dictated by the internet service provider and its internal infrastructure/procedures, these changes generally happen infrequently over a period of weeks or months and not within several minutes.

D. Alhashemi Identified as Leader of Zoom Raid Group

74. An open-source query of D.K.’s email account, revealed that D.K., who had impersonated the FBI during the June 15 Fresno City Council Zoom meeting, had a YouTube channel under the name “Dxxxx Kxxxxxxxxxxxx.”

75. A review of D.K.’s videos revealed two videos described as “Zoom Raids” in what appeared to be a targeting of U.S.-based Zoom meetings. In these videos, it appears that D.K. was communicating with others through the messaging applications Discord and Riot.im (now Element, a UK-based chat software) in order to locate and target open/public Zoom meetings. The Discord channel that was being used was entitled “Zoom University” and the Riot.im channel was titled “Zoomtopia.”

76. One of D.K.'s Zoom Raids videos (entitled "Zoom böyle raidlenir. Forestda yapamadığımız cihadı burda yaptık. İntikam alındı"⁸) displayed D.K. and his associates Zoom bombing a live wedding broadcast on July 11, 2020, on Zoom from Rochester, New York. Approximately five to ten individuals from Inseeno's (later identified as **Alhashemi**) Zoom raid group, who appear to be acting in concert, made the following statements through the Zoom chat function to everyone on the call: "Kill Niggers," "Kill Jews," "white power," "This couple will get Jihaded by allahs [sic] will today." The Zoom bombers also displayed Nazi symbols, a video and a still picture of a cross burning at a Ku-Klux-Klan meeting, video of the New York Twin Towers being attacked, and a video of terrorists executing people. The Zoom bombers also coordinated via the Riot.im messaging application to change their screen names to "Fuck Niggers."

77. Zoom records indicate that C.G. was present during the wedding Zoom bomb and used the screen name "Sophie Clarke." Zoom records show that "Sophie Clark" logged into this Zoom meeting with IP address 24.191.116.145, the same IP address that C.G. used for the Fresno City Council meetings. The Zoom UUID was also the same as the Fresno City Council meetings.

78. Zoom records also reveal R.B.'s online presence during the wedding Zoom bomb, using the Zoom screen name "Juliet Rossi," a moniker that R.B. used during the June 22 Fresno City Council Zoom meetings and June 20 New Mexico Jewish service. R.B. appeared to use a virtual private network to obfuscate his IP address, but R.B.'s Zoom UUID stayed consistent across the aforementioned Zoom raids.

79. M.M. also participated in the New York wedding Zoom bomb using the Zoom moniker "Henry W." Within the video, several Zoom video displays can be observed. M.M. displayed a video of a Nazi flag. At the beginning of the same video, M.M. (still using moniker "Henry W.") typed the

⁸ According to Google Translate, D.K.'s video is entitled in Turkish and translates to: "This is how Zoom is raided. We did the jihad here. Revenge taken."

1 following message in the Zoom chat box to everyone on the call: “KILL JEWS” and “LONG LIVE
2 HAMAS.” Zoom records contained detailed device information , including serial number for the Apple
3 computer that M.M. used. Records from Apple, Inc. related to M.M.’s Apple serial number connected
4 the computer to M.M.’s parents with a physical address in the London, England and M.M.’s email
5 address, the same email address M.M. used for the June 22 Fresno City Council Zoom meeting.
6

7 80. Although Zoom records do not show Alhashemi’s presence during the wedding Zoom
8 bomb, the video shows D.K. simultaneously using a Riot.im gaming chat application which displayed a
9 partial list of the channel users, including the screen name “**Inseeno**,” (later determined to be
10 **Alhashemi**) for the Zoom raid group, as indicated by interviews of members of the group. The list also
11 indicates that “**Inseeno**” was the moderator of the group (who controls content). The FBI then
12 conducted an open-source search of “**Inseeno**,” which revealed an account on the gaming chat
13 application “Guilded.” “**Inseeno’s**” profile on the account indicates that he was an administrator for
14 the channel titled “Zoom Meetings Public Directory.” A screen shot also used a profile picture of
15 gaming streamer “leafyishere,” a picture often used for memes, that “**Inseeno**” used as his profile
16 picture across several gaming chat platforms, including Riot. Records obtained from Guilded indicate
17 that “**Inseeno**” had similar IP addresses associated with the aforementioned Zoom screen names
18 ultimately associated with **Alhashemi** from the Fresno City Council and New Mexico intrusions.
19

20 81. Guilded records for subscriber information for all the users on the Zoom Meetings Public
21 Directory channel also confirm that Guilded moniker “**Inseeno**” and “Bryan Patterson,” “Johnathan
22 O’Bryan,” “Johnathan Mcallster,” “Michael Patterson,” and “**Inseeno** O’Mally” from the Fresno City
23 Council Zoom calls and “Johnathan B” from the New Mexico Jewish service shared similar IP logins,
24 indicating the same internet service provider was utilized. Internet service providers typically operate
25 blocks, or groups of consecutive IP addresses. “**Inseeno’s**” logins on Guilded are unique in that they
26 are attributed to **ALBtelecom**, an Albanian internet service provider. “**Inseeno**”/**Alhashemi** is the only
27
28

member of the Zoom raiding group who used this internet service provider. Guided records further indicate that three Guided users (“Inseeno,” “Mike,” and “Vanter”) from the Zoom Meetings Public Directory channel logged into Guided using the exact same **ALBtelecom** IP address **79.106.126.86** during a three-hour period on July 25, 2020. As described above, separate online accounts utilizing the same IP address within a short period of time, in this case three hours, strongly suggests that the accounts were being accessed by a single customer or subscriber, suggesting that “Inseeno,” “Mike,” and “Vanter” are the same customer or subscriber. “Vanter” also registered his Guided account with the email address amrtamar23@gmail.com, which is associated with the Fresno City Council Zoom bombing incidents.

82. Likewise, Guided records for Vanter show that on July 28, 2020, Vanter logged in with the **ALBtelecom** IP address **79.106.126.112**, the same IP address utilized 33 minutes later to log into the email account amrtamar29@gmail.com. This same IP address was also used to log into the email account amrtamar23@gmail.com the next day, on July 29, 2020. The same principles regarding similar IP logins elucidated above apply.

E. Interviews of Zoom Raid Group Members

a. M.M.

83. On February 27, 2022, law enforcement officials from the United Kingdom’s Metropolitan Police Service (MET) conducted a search of M.M.’s residence and interrogated him. According to a MET detective, M.M. was cooperative and provided information on “**Inseeno**”/**Alhashemi**’s Zoom raid group.

84. M.M. advised that the group had not recently been involved in Zoom bombing, but focused more on the topic of the war in Ukraine. The Russian invasion of Ukraine was February 24, 2022. M.M. did not know many of the names of the individuals in the group but indicated that

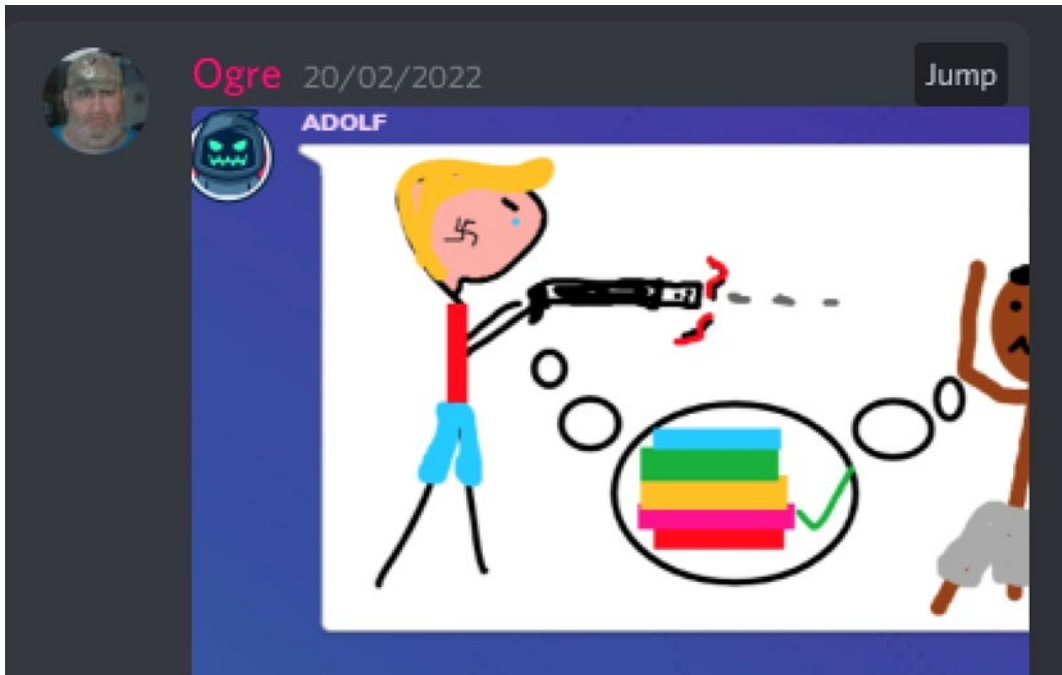
1 “Sapper” and “**Inseeno**” have full control of the group. M.M. advised that “**Inseeno**” lives in Tirana,
2 Albania and “Sapper” is 18 years old, attends college, and lives in the United Arab Emirates.⁹

3 85. According to M.M., “Sapper” is known for putting on ISIS videos and possesses a World
4 War II hand gun replica. M.M. advised that the Discord server for the Zoom bombing group was at that
5 time “Gentleman's Club.” “Sapper’s” Discord account name was Citizen#7181 and “**Inseeno**’s”
6 Discord account name was Ogre#8627. M.M.’s Discord account name was Anti#1295.

7
8 86. According to the MET detective, M.M. provided consent to assume his Discord account
9 under Anti#1295. On February 27, 2022, the FBI case agent, using a covert laptop, logged into M.M.’s
10 Discord account. Once inside M.M.’s Discord account, the case agent took screen captures of M.M.’s
11 account, relevant communications (including references to Albania), and posts within the “Gentleman's
12 Club” Discord Channel –

13 [url:https://discord.com/channels/854737557136867338/943262396900851732](https://discord.com/channels/854737557136867338/943262396900851732). On March 1, 2022, the
14 case agent again logged into M.M.’s Discord account. It did not appear at that time that M.M. had
15 notified the other members of his law enforcement contact and the associated Discord channel
16 remained active. The case agent located additional relevant communications related to Ogre#8627
17 (**Alhashemi**) including the below image:
18
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20
21
22
23
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27

28 ⁹ Subsequent digital evidence obtained for “Sapper” revealed that he is actually from Jordan.



87. Discord records associated with Ogre#8627 contain the associated IP logins. These IP addresses were subsequently queried through open-source databases to locate relevant information. The IP address logins attributed to Ogre#8627 revealed that Ogre#8627 logged into Discord from the Teesside University in the United Kingdom. Ogre#8627 also used services from Vodafone UK, ostensibly to log into Discord using mobile services.

88. On March 31, 2022, MET advised that it had located an Albanian from Tirana named **Mohammad Amr Alhashemi**, residing at Teesside University. MET also advised **Alhashemi** is a student at the university and is studying computer science. MET further indicated that **Alhashemi**'s email was mhdamralhashim1@gmail.com and phone number was 966595303073. This information was corroborated through an official Mutual Legal Assistance Treaty (MLAT) request for records from Teesside University and British immigration authorities. Vodafone records relating to Ogre#8627 logins were, however, no longer available.

89. Google and Discord records show mhdamralhashim1@gmail.com and Ogre#8627 logged into the Teesside University network within a short timeframe from the same IP address.

90. Based on Discord records, Ogre#8627 repeatedly and consistently used the same five IP addresses over the period of several weeks - **5.151.133.209**, **5.151.133.210**, **5.151.133.211**, **5.151.133.212**, **5.151.133.213** (associated with glide.co.uk, a United Kingdom internet service provider). The same block of IP addresses were also used with the Google account, amrtamar29@gmail.com, that is associated with the Fresno City Council Zoom bombings through the same Zoom UUID, and the email address that **Alhashemi** provided to Teesside University (mhdamralhashim1@gmail.com) within minutes to hours of one another. For example:

Account	Date	Time	IP address	Location
Mhdamralhashim1@gmail.com	1/19/2022	17:31 UTC	5.151.133.210	Middlesbrough
Ogre#8627	1/19/2022	19:37 UTC	5.151.133.210	Middlesbrough
Amrtamar29@gmail.com ¹⁰	1/17/2022	19:01 UTC	5.151.133.211	Middlesbrough
Ogre#8627	1/17/2022	17:32 UTC & 22:54 UTC	5.151.133.211	Middlesbrough

Consistent IP address overlap is further supporting evidence for the assessments drawn in Section IV, the summary of the proof of the identification of **Alhashemi**.

91. In April 2022, Google produced records, pursuant to a grand jury subpoena for email addresses attributed to **Alhashemi**: amrtamar23@gmail.com, amrtamar29@gmail.com and amrhashemi404@gmail.com. Subscriber information for the email addresses amrtamar23@gmail.com and amrtamar29@gmail.com listed phone number 966595303073, the telephone number of record for **Alhashemi** at Teesside University. In addition, the Google Pay address for amrtamar29@gmail.com was updated on December 16, 2021, to an address in Middlesbrough, where Teesside University is located. This information coincides with visa information provided by the UK pursuant to an MLAT request, which indicates that **Alhashemi** began attending Teesside University in November 2021.

92. An analysis of the IP records from Google Accounts amrtamar23@gmail.com, amrhashemi404@gmail.com, amrtamar29@gmail.com, mhdamralhashim1@gmail.com, as well as

¹⁰ This is the same e-mail associated with the Zoom UUID and Zoom bombings described above.

Discord account Ogre#8627, reveals that all of these accounts are associated with one another through similar IP logins. As described above, separate online accounts utilizing the exact same IP address within a short period of time, strongly suggests that that the accounts were accessed by a single customer or subscriber. All of the accounts, with the exception of Ogre#8627, had IP logs originating in the country of Albania. The exception with Ogre#8627 is because this account was not created until December 2021, after **Alhashemi** moved to the UK. Google account amrhashemi404@gmail.com was deleted on October 11, 2021. This is significant because online accounts amrtamar23@gmail.com, amrtamar29@gmail.com, and Discord Account Ogre#8627 have IP address data showing the user of these accounts went from Albania to Middlesbrough, England in the same timeframe that **Alhashemi** moved from Albania to Middlesbrough, England to attend Teesside University.

b. **P.M.**

93. During a search of R.B.'s residence, R.B. (who was present during some of the Fresno City Council and the New York wedding Zoom meetings) identified "Todd Williams" as one of the Zoom raiders and indicated that "Todd Williams" had expressed a desire to conduct a school shooting and to "kill someone."

94. Guided records revealed the screen name "Todd Williams" and an associated registration email address and an associated IP address of 50.39.101.94. Based on this information, agents were able to locate P.M, who was then 13 years old, in Beaverton, Oregon.

95. FBI agents interviewed P.M. in the presence of his parents on August 31, 2020. P.M. admitted he used the moniker "Todd Williams." He initially denied but later admitted to Zoom bombing his school with others. According to P.M., "**Inseeno**" is the leader of the group. P.M. said he thinks "**Inseeno**" is from Europe, has a deep voice, and is 16 years old or older. "**Inseeno**" is the owner of the group and leads the discussion on Zoom raiding. P.M. said "**Inseeno**" told the group they have a "ton" of meetings to bomb and talked about city council meetings and other meetings.

1 According to P.M., “**Inseeno**” is a “real racist” and says a lot of hateful things toward minorities and
 2 other groups. P.M. said “**Inseeno**” has told the group, “Fuck all Niggers” and other things. P.M. said
 3 “**Inseeno**” also has access to peoples’ addresses and has doxed several people.¹¹ P.M. also indicated
 4 the group doxes Catholic Priests, Jewish leaders, city leaders, school leaders, yoga classes, and cooking
 5 classes. P.M. expressed concern the group would try to dox him if he left the group.

7 96. P.M. said “**Inseeno**” had Zoom bombed parent/teacher meetings in Alabama and Texas,
 8 where schools have had active shooters and makes fun of them. P.M. said “**Inseeno**” loves to offend
 9 people and talks about racist things more than anyone else.

10 97. P.M. stated the group coordinates the Zoom intrusions by locating Facebook events and
 11 Zoom events. P.M. said “**Inseeno**” targeted minorities or LGBT people. P.M. also provided a list of
 12 the Zoom raiders in the Guilded group, which included “**Inseeno**,” as well as “Weiderfungus” (the
 13 screen name for C.G.), “Sapper,” “Captain Green” (who was identified by B.O.), and “Anti” (M.M.).

15 c. **C.G.**

16 98. C.G. was interviewed in the presence of his parents during the execution of a federal
 17 search warrant at his residence on March 10, 2021. C.G. said he communicated with a large group of
 18 people on Discord to participate in Zoom raids. “**Inseeno**” was the leader of the Zoom raid Discord
 19 chatroom. “**Inseeno**” was from Albania. C.G. met “**Inseeno**” in April 2020. “**Inseeno**” was a member
 20 of “the original Discord group.” “**Inseeno**” advised the group to communicate on Telegram, an
 21 application. According to C.G. “**Inseeno**” wanted the group to communicate on Telegram because
 22 Discord had banned the whole group several times for violating Discord’s terms of services and for
 23

25
 26 ¹¹ Screen shots of Doxbin and interviews with P.M. and L.T. indicate that **Alhashemi** was
 27 involved in the doxing of L.T., 16. According to P.M., L.T. was part of the Zoom raid group with P.M.
 28 until she expressed her opposition to the group’s race-based Zoom remarks. Screen shots of Doxbin
 also show that **Alhashemi** doxed the chief marketing officer, president of product and engineering, head
 of security engineering, and chief people officer at Zoom. Doxbin is a pastebin primarily used by
 people posting personal data (often referred to as doxing) of any person of interest.

1 cyber bullying. After a new group on Discord was created, the group information was communicated
 2 via Telegram. In addition, “back up communications,” like Telegram, were established in the event law
 3 enforcement spoke to anyone in the group. “**Inseeno**” told the group that “if any cops come, go into
 4 the chat.” According to C.G., individuals That resided in the United States “cared” if law enforcement
 5 approached individuals in the Discord group. Individuals that resided the outside of the United States
 6 were not afraid of the FBI.
 7

8 99. C.G. identified other members of the Discord raid group, including “Todd Williams”
 9 (P.M.) and correctly indicated that he resides in Oregon.

10 d. **B.O.**

11 100. On May 6, 2021, FBI agents in North Carolina interviewed B.O. while his parents were
 12 present. B.O. admitted he was present during the Zoom bombings of the June 20 Jewish service in
 13 New Mexico and the July 11 Rochester wedding. As noted above, Zoom records show B.O. was
 14 present at the New Mexico service using screen name “Emily C” Zoom records also show B.O. was
 15 present during the June 9 Fresno City Council meeting using the screen name “Nick B,” June 11
 16 council meeting using the screen name “Ashley M,” June 15 council meeting using the screen names
 17 “Ashley May” and “Jack J,” June 22 council meeting using the screen names “Emily C” and “Nick B,”
 18 and “Jack.”
 19

20 101. B.O. stated that RaidCord.net is a site used by Zoom Bombers to post new Zoom Raiding
 21 sites. RaidCord.com is a site used by Zoom Bombers to view Zoom bombs that were conducted. All
 22 Zoom bombs that were executed were posted by “Captaingreen5,” “Inseeno,” and “Sapper.”
 23

24 102. According to B.O., “Inseeno” used Nord VPN (an online VPN service that encrypts
 25 internet traffic and obfuscates the user’s IP address), is very good with computers, lives in Albania, and
 26 speaks English very well. B.O. also stated that “Inseeno” owns Discord servers, had “ratted” or
 27 accessed via spyware B.O.’s computer, and typically posted the Zoom bomb codes on Discord.
 28

103. B.O. also identified screen names used by other co-conspirators, including C.G. (“Weiderfungus” and “Vance Walker,” C.G.’s screen name for the June 25 Fresno City Council meeting) and correctly stated his name is Cxxx Gxxxxxxx who resides in New Jersey and had already been contacted by the FBI; and M.M. (“Anti” or “Anti-Antifa”) and described him as a Bulgarian residing in the United Kingdom.

e. **A.M.**

104. Axxxx (A.M.) was identified by P.M. and others as a member of the Zoom raid group who would frequently discuss bombing, blowing thing up, and would reference ISIS. The FBI later determined through digital evidence that Axxxx was A.M. of North Potomac, Maryland.

105. On October 14, 2020, A.M., who was then 17, was interviewed by FBI agents in the presence of his mother. Although he initially denied any involvement in Zoom bombing, he later admitted that on the online forums he talked to his online friends, including “**Inseeno**” who is from Albania and “CaptainGreen5” (identified by P.M. and B.O.). On these forums, A.M. saw discussions from these people about hacking into Zoom meetings. A.M. participated in these Zoom meeting intrusions and searched Facebook and Twitter for Zoom call information in order to post that information to the forum for Zoom meeting intrusions. He participated in Zoom meeting intrusions many times. During the Zoom meetings, he turned his video camera off and posted memes and messages but did not remember what he said. He recalled entering a local government Zoom meeting around July or August 2020 and entering another organization’s Zoom meeting. A.M. said the Zoom raiders posted gore videos, made bomb threats, and racist comments, indicating they would kill all of the meeting participants. Although he participated in the Zoom raids, he claimed he merely posted “random things.” He did admit to having antisemitic beliefs.

106. According to A.M., “**Inseeno**” was the ring leader and chief of the forum. He also identified the monikers of the Zoom raid groups members, including “Weiderfungus” (whom he

1 correctly identified as C.G.), and “Todd Williams” (whom he correctly identified as P.M., 13, living in
2 Oregon).

3 107. In a second interview on October 16, 2020, in the presence of his mother, A.M. reiterated
4 that “**Inseeno**” was the chief and creator of the Zoom meeting intrusion forums. A.M. provided screen
5 shots from Raidcord.net, which shows his interactions with “**Inseeno**”/**Alhashemi**, who at one point
6 posted A.M.’s address for all to see and discussed swatting A.M.
7

8 f. **K.H.**

9 108. FBI agents interviewed K.H., a juvenile residing in Livermore, California, in the presence
10 of his father. K.H. identified “**Inseeno**,” as an administrator of the Guilded channel, Zoom
11 Meetings Public Directory. He admitted to participating in Zoom bombings with members of the
12 Zoom Meetings Public Directory group.

13 109. K.H. indicated that the Zoom bombers would go into peoples’ Zoom meetings
14 without permission and “bombing it.” He indicated that the members would “just have fun in there,”
15 and do anything to disturb it by playing music that made people feel uncomfortable and using words
16 that would offend people. To this end, slurs, such as “nigger” and other offensive terms like “retard,”
17 would be used to offend the participants. The goal, K.H. explained, was to create such a disturbance
18 that the hosts have no choice but to terminate the meeting. Hurting peoples’ feelings and/or offending
19 others along the way was completely in bounds.
20

21 **IV. SUMMARY OF PROOF OF IDENTIFICATION OF ALHASHEMI**

22 110. Based on the foregoing, as well as my training, experience, and consultations with the
23 FBI Computer Scientist referenced above, I believe that the individual who was present during the
24 Fresno City Council Meetings and New Mexico Jewish service discussed above who used the screen
25 names Jacob Rothschild, Matte Flores, Bryan Patterson, Johnathan O’Bryan, Brian Mcallster, Jonathan
26 Mcallster, Felix Kjellberg, Mike Patterson, Michael Patterson, Johnathan B., Lynn Portmen, Michael
27
28

Portmen, Ryan Patterson, Inseeno O'Mally, Megan Charolett, Megan P., Michael Washburn, and Chris K-Andesron ("Zoom Aliases") are one and the same person, because they all shared the same Internet Service Provider, MAC address, and Zoom UUID. Internet service provider: **ALBtelecom**. MAC address: **185E0FE141C8**. Zoom UUID: **742Va33YoA0zbdaSxZmHpHb5X4Sao7e5bjm8K9g/IP0=**

111. Internet Protocol ("IP") addresses are unique numbers that identify each computer or device connected to the Internet. Just as the postal system operates by listing physical addresses in order to know where to deliver the package to, a computer cannot receive or send information over the global Internet without a unique IP address. Further, every packet of information transmitted over the Internet contains its source and destination addresses in plain sight in its packet header. Thus, when an individual undertakes any transaction over the Internet, he or she transmits to the recipient server the public IP address assigned to his or her home router or internet access point assigned to them by their Internet service provider.

112. Using WHOIS, an online database which is widely relied upon by the computer industry and computer networking professionals and which stores records maintained by Regional Internet Registries (RIRs) with information on the owners of IP address ranges, or blocks, investigators determined that all IP addresses which were associated with the aforementioned Zoom activity -and which began with **79.106.126** were owned by **ALBtelecom**, an Albanian internet service provider.

113. According to Zoom records, all of the Zoom Aliases had a MAC address of "**185E0FE141C8**," indicating the use of the same device. A Media Access Control (MAC) address is a unique identifier programmed into a device's network interface. The address is utilized in low-level networking communications between computers on the same local area network (LAN) and is made to be unique from any other devices by the device manufacturer. Unlike an IP address, a MAC address is generally bound to the device hardware itself, and will stay the same no matter what method or IP address is used to access the internet.

114. Records subpoenaed from Intel confirmed that the foregoing MAC address is associated with an Intel digital device with a serial number of E141C8485CXH59954003. These records were received from Intel on August 30, 2023.

115. The previously mentioned “Zoom Aliases” shared the same Zoom UUID of (“742Va33YoA0zbdaSxZmHpHb5X4Sao7e5bjm8K9g/IP0=”). While it is unknown what exact method Zoom uses to create the Zoom UUID, industry standards dictate that it is likely a unique identifier (UUID) either uniquely generated upon the installation or first usage of the Zoom software, or generated based on a Zoom user’s unique device configuration. This UUID would have likely allowed Zoom to track a Zoom user, similar to a User ID, and would stay the same for the user even if his or her IP address or screen name changed. Based on this, the individual who used the screen names referenced in this section almost certainly used the same digital device.

116. Zoom legal process served for information regarding the above-mentioned Zoom UUID indicates that early on the user linked the email accounts amrtamar23@gmail.com and amrtamar29@gmail.com to the above Zoom UUID. Subscriber information returned from legal process served to Google for these accounts, identified that both accounts had linked the same recovery SMS phone number, **966595303073**. +966 is the country code for Saudi Arabia. Google records obtained pursuant to a federal search warrant indicate that from 2018 to 2019 the user of the email accounts amrtamar23@gmail.com and amrtamgar29@gmail.com accessed them in Saudi Arabia. Geolocation information for these accounts indicate that on July 3, 2019, the user traveled by air from Riyadh, Saudi Arabia to Athens, Greece with a final destination to Tirana, Albania. Further, on July 3, 2019, the user of the email account amrtamar23@gmail.com accessed it in Albania.

117. In the context of a Google account, a recovery SMS phone number serves as a method for the Google account owner to regain access to the account in the event that access is lost, when, for example, the owner forgets his or her password. This works via the Google “Forgot Password” feature,

which allows the account owner to instruct Google to send a one-time recovery pin to the recovery SMS phone number on file with Google for the account. If the owner then provides back that one-time pin, Google will automatically allow the user to reset the password and regain access to the account. The implications for this indicate that the phone number provided for the two above listed Google accounts, amrtamar23@gmail.com and amrtamar29@gmail.com, serves as a means to recover access to the accounts, and that therefore the number is owned, operated, and/or accessible by the Google account owner, as the recovery feature would not work if the account owner were to provide a phone number they do not control. It should also be noted that most online services, Google included, require a user to verify any phone number they link to the service in order to ensure that the user actually has access to that number.

118. Teesside University records obtained pursuant to an MLAT request, indicate that a student enrolled at Teesside University, **Mohammad Amr Alhashemi** with a Tirana, Albania address, is associated with the email address mhdamralhashim1@gmail.com and phone number **966595303073**. This phone number was observed to be the same number listed as the recovery SMS number of the two aforementioned Google accounts, amrtamar23@gmail.com and amrtamar29@gmail.com. It should be noted that this phone number overlap is believed to be the most significant attribution, as it connects the real world person **Mohammad Amr Alhashemi** to Google accounts which were shown to be directly linked to the aforementioned Zoom activity. Unlike IP addresses, phone numbers are reasonably expected to be under the control of a single individual, lending additional weight to the aforementioned connection.

119. Within Teesside student records, phone number **966595303073** was listed as a phone number for student **Mohammad Amr Alhashemi**. In general, organizations, such as educational institutions maintain records of contact information in order to contact the student or member of the organization. Conversely, members of organizations, such as educational institutions provide contact

1 information, such as a contact phone number, as a number at which they can be reached (*e.g.* a personal
2 cellphone). Considering the context of this contact record maintained by Teesside University, a
3 student, including **Alhashemi**, would likely provide a true phone number at which they could be
4 contacted.

5
6 120. Based on Google records, there are strong digital connections between the email
7 **Alhashemi** provided to Teesside University (mhdamrhashim1@gmail.com) and the emails connected
8 to the Zoom bombing activity: amrtamar23@gmail.com and amrtamar29@gmail.com. For example,
9 on January 17, 2022, at approximately 8:00 UTC, amrtamar23@gmail.com, amrtamar29@gmail.com
10 and mhdamrhashim1@gmail.com were all accessed utilizing IP address **5.151.133.212**, associated
11 with internet service provider Glide in the United Kingdom. Specifically, this IP address resolved to
12 Middlesbrough, England, the location of Teesside University. The fact that all three accounts were
13 utilized at essentially the exact same time with the same IP address indicates a very strong probability
14 that the same individual was utilizing all three email accounts, thereby linking the Zoom bombing
15 activity to the Teesside University student **Alhashemi**. Email addresses amrtamar23@gmail.com and
16 amrtamar29@gmail.com were provided to Zoom by the Zoom user with Zoom UUID
17 (“742Va33YoA0zbdaSxZmHpHb5X4Sao7e5bjm8K9g/IP0=”), which conducted the Zoom bombing
18 activity described above. Email address mhdamrhashim1@gmail.com was provided by **Alhashemi**
19 to Teesside University. The digital connection between these email addresses also existed when
20 **Alhashemi** was residing in Albania, prior to moving to the United Kingdom.

21
22
23 121. The co-conspirators who were interviewed by the FBI, as discussed herein, were also tied
24 to the Zoom bomb incidents during the Fresno City Council meetings and New Mexico Jewish service
25 through their Zoom screen names, UUID, MAC addresses, and IP addresses. The same techniques
26 utilized to identify and interview these individuals were the techniques used to identify **Alhashemi**.
27 These witnesses further attested to the fact that **Inseeno** was from Albania and is racist. As noted
28

above, one of these witnesses, M.M., indicated that **Inseeno** used the Discord account Ogre#8627. According to Discord and Google records, there are strong digital connections between Discord account name Ogre#8627 and email address amrtamar29@gmail.com as detailed above – both Ogre#8627 and the Gmail account logged onto the Teesside University network using the same IP address within short periods of time (between minutes and hours). When the FBI obtained permission from M.M. to access his Discord account, the FBI confirmed that Ogre#8627 spoke about Albania and harbors racist views.

122. Based on the above, there is an overwhelming connection between accounts associated with “Inseeno” and the telephone number and email address Teesside University has on record for Alhashemi. These connections are present across a large swath of time and even track from Tirana, Albania, Saudi Arabia, and to Middlesbrough, England. Moreover, these overlaps and connections between records outlined herein establish that the same person – **Alhashemi** – was using the Gmail, Zoom and Discord accounts and the Saudi Arabian phone number **Alhashemi** provided to Teesside University as his contact number and as a recovery number for the e-mails associated with the Zoom bombings – amrtamar23@gmail.com and amrtamar29@gmail.com. When considered in conjunction with the geographical movement of the user of the accounts and phone in tandem with **Alhashemi**’s geographical movement this evidence identifies **Alhashemi** not only as the person who established the accounts or owned the phone number but also as the person who used them, including to commit the Zoom bombings that are the subject of the crimes charged herein.

123. Therefore, it is my opinion, as well as the opinion of the FBI Computer Scientist with whom I consulted, that the user of the Zoom screen names identified in this section are one and the same and that they are in fact **Mohammad Amr Alhashemi**, the student from Albania who is studying software engineering at Teesside University in England.

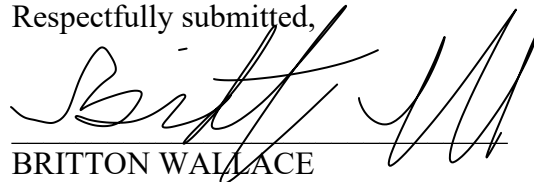
V. CONCLUSION

124. Based on the facts set forth above, there exists probable cause to believe that **Mohammad Amr Alhashemi** was involved in the above-described offenses, and request that the Court authorize the complaint and issue an arrest warrant.

VI. REQUEST TO SEAL

125. I further request that the Court seal all papers submitted in connection with this Affidavit, including the complaint and the arrest warrant, except that copies may be maintained by the U.S. Attorney's Office and may be served on Special Agents and other law enforcement officers. These documents pertain to an ongoing criminal investigation that is neither public nor known to Alhashemi. Accordingly, there is good cause to seal these documents because their premature disclosure may seriously jeopardize this investigation, cause **Alhashemi** to flee, and better ensure the safety of agents and the general public at the time the arrest warrant is executed.

Respectfully submitted,



BRITTON WALLACE
Special Agent
Federal Bureau of Investigation

Affidavit submitted by email/pdf and attested to me as true and accurate by telephone consistent with Fed. R. Crim. P. 4(d), 4.1, and 41(d)(3) before me this 15 day of May 2024.


Honorable Barbara A. McAuliffe
UNITED STATES MAGISTRATE JUDGE

Approved as to form

/s/ Karen A. Escobar
KAREN A. ESCOBAR
Assistant United States Attorney